

EXHIBIT 1

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6 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
7 **IN AND FOR THE COUNTY OF SPOKANE**

8 COUNTY OF SPOKANE, a political
9 subdivision of the State of Washington,

10 Plaintiffs,

11 v.

12 STATE OF WASHINGTON and
13 WASHINGTON STATE DEPARTMENT
OF TRANSPORTATION,

14 Defendants.

NO. 22-2-03537-32

DECLARATION OF BRIAN
SCHAEFFER

15 Under penalty of perjury under the laws of the State of Washington, the following
16 statements are true and based on my personal knowledge:

- 17 1. My name is Brian Schaeffer and I am the Fire Chief for the City of Spokane and
18 have served in this position since May, 2017.
- 19 2. On November 29, 2022 myself and several other Fire personnel were at the WSDOT
20 homeless encampment checking on the welfare of the residents and to ensure they
21 were following protocol set in place by the Spokane Fire Department; such as
22 continual fire watch and to ensure an adequate number of fire extinguishers on site.
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1 While we were on site, it was reported that an RV fire had started. The fire
2 extinguishers on site were deployed but the fire overcame the useful strength of the
3 available extinguishers. We called for a fire-fighting apparatus to combat the
4 flames. While the RV was destroyed by the fire there were no reported injuries or
5 loss of life resulting from the fire.

- 6 3. During the fire, the camp was evacuated and personnel from the Spokane Fire
7 Department conducted a head count in attempt to ensure all persons at the site were
8 accounted for both during and after the fire. The total count of camp residents that
9 left their tents and RV's to evacuate the encampment was approximately 240
10 individuals. The scene was chaotic with people moving all over the encampment
11 but the number of people who evacuated the site appeared to be significantly less
12 than the 445 full time residents as reported by representatives of Washington State.
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15 DATED this 30th day of November, 2022 in Spokane, Washington.
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19 Brian P. Schaeffer
20 Brian Schaffer, Fire Chief, City of Spokane
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CERTIFICATE OF SERVICE

I hereby declare under the penalty of perjury and the laws of the State of Washington that the following statements are true. On the 30th day of November 2022, I caused to be served a true and correct copy of the foregoing document by the method indicated below, and addressed to the following:

Attorney General of Washington State
Complex Litigation Division
800 5th Avenue, Suite 2000
Seattle, WA 98104-3188
506-464-7744

☐ U.S. Mail, postage prepaid
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DATED this 30th day of November 2022, at Spokane, Washington.



Ashley E. Musick